

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

JOHN DOE,

Plaintiff,

v.

TRUSTEES OF DARTMOUTH COLLEGE,

Defendant.

Civil Action No.: 22-CV-00018-LM

PLAINTIFF'S MOTION TO COMPEL DISCOVERY

NOW COMES Plaintiff John Doe, by and through counsel, Shaheen & Gordon, PA, moving to compel discovery and, in support thereof, states as follows:

1. Plaintiff John Doe ("Doe") respectfully moves this Court to compel Defendant Trustees of Dartmouth College ("Dartmouth") to respond to certain interrogatories and requests for production.

2. Specifically, Doe seeks Dartmouth's Title IX training materials from the years 2019 and 2020 that are relevant to claims and defenses in this matter.

3. Doe also seeks relevant Title IX materials from prior matters in which statements of an intoxicated female student was credited by Dartmouth.

4. This Motion is supported by the accompanying memorandum of law.

5. Undersigned counsel has conferred with Attorney Daryl Lapp who advises that Dartmouth objects to the relief sought herein.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court:

A. Grant the within Motion

B. Compel Defendant to answer Interrogatory Numbers 4, 5, and 8;

- C. Compel Defendant to produce documents responsive to Request Numbers 15 and 21; and
- D. Grant such further relief as this Court deems necessary and just.

Date: March 1, 2023

Respectfully submitted,

/s/ William E. Christie

William E. Christie (NH Bar #11255)

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CERTIFICATE OF SERVICE

I, William E. Christie, hereby certify that a copy of the foregoing document, filed through the CM/ECF system, will be served conventionally on all parties or their counsel.

/s/ William E. Christie

William E. Christie